

PREET BHARARA  
United States Attorney for the  
Southern District of New York  
By: REBECCA S. TINIO  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
T: (212) 637-2774  
F: (212) 637-2702  
E-mail: rebecca.tinio@usdoj.gov

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X	
BROOKLYN CENTER FOR INDEPENDENCE	:
OF THE DISABLED, a nonprofit organization,	:
CENTER FOR INDEPENDENCE OF THE	:
DISABLED, NEW YORK, a nonprofit	:
organization, GREGORY BELL, an individual,	:
and TANIA MORALES, an individual,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
MICHAEL R. BLOOMBERG, in his official	:
Capacity as Mayor of the City of New York, and	:
the CITY OF NEW YORK,	:
	:
Defendants.	:
----- X	

No. 11 Civ. 6690 (JMF)

DECLARATION OF  
REBECCA S. TINIO

Rebecca S. Tinio, pursuant to the provisions of 28 U.S.C. § 1746, declares, under penalty of perjury, as follows:

1. I am an Assistant United States Attorney in the office of Preet Bharara, United States Attorney for the Southern District of New York, attorney for the United States of America (“the Government”) in the above-captioned matter. I am the attorney assigned to this matter. I submit this declaration in support of the Government’s Statement of Interest.

2. Attached hereto as Exhibit A is a true and correct copy of Chapter 7 of the Department of Justice Tool Kit (“DOJ Tool Kit”), “Emergency Management Under Title II of

the ADA,” without the addenda thereto, printed from  
<http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf>.

3. Attached hereto as Exhibit B is a true and correct copy of Addendum 1 to Chapter 7 of the DOJ Tool Kit, printed from  
<http://www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.pdf>.

4. Attached hereto as Exhibit C is a true and correct copy of Addendum 2 to Chapter 7 of the DOJ Tool Kit, printed from <http://www.ada.gov/pcatoolkit/chap7shelterprog.pdf>.

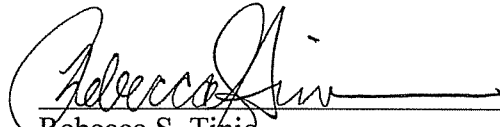
5. Attached hereto as Exhibit D is a true and correct copy of Addendum 3 to Chapter 7 of the DOJ Tool Kit, printed from <http://www.ada.gov/pcatoolkit/chap7shelterchk.htm>.

6. Attached hereto as Exhibit E is a true and correct copy of a Settlement Agreement between the United States of America and the City of Jacksonville, Florida under the Americans with Disabilities Act, dated April 19, 2013 (compliance review DJ 204-17M-398), printed from [http://www.ada.gov/jacksonville\\_pca/jacksonville\\_pca\\_sa.htm](http://www.ada.gov/jacksonville_pca/jacksonville_pca_sa.htm).

7. Attached hereto as Exhibit F is a true and correct copy of a report of the National Council on Disability, titled “Saving Lives: Including People with Disabilities in Emergency Planning,” dated April 15, 2005, printed from <http://www.ncd.gov/publications/2005/04152005>.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
May 10, 2013

  
Rebecca S. Tinio